

1 BILAL A. ESSAYLI  
2 Acting United States Attorney  
3 JOSEPH T. MCNALLY  
4 Assistant United States Attorney  
5 Acting Chief, Criminal Division  
6 J. MARK CHILDS (Cal. Bar No. 162684)  
7 Assistant United States Attorney  
8 Chief, Transnational Organized Crime Section  
9 JEREMY K. BEECHER (Cal. Bar No. 301272)  
10 MATT COE-ODESS (Cal. Bar No. 313082)  
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19 Attorneys for Plaintiff  
20 UNITED STATES OF AMERICA

21 UNITED STATES DISTRICT COURT

22 FOR THE CENTRAL DISTRICT OF CALIFORNIA

23 UNITED STATES OF AMERICA,

24 Plaintiff,

25 v.

26 EDGAR JOEL MARTINEZ-REYES, ET  
27 AL.,

28 Defendants.

Case No. 2:23-CR-00524 (A) -DMG

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 10/21/25  
**PROPOSED TRIAL DATE:** 6/2/26

29 Plaintiff United States of America, by and through its counsel  
30 of record, the Acting United States Attorney for the Central District  
31 of California and Assistant United States Attorneys J. Mark Childs,  
32 Jeremy K. Beecher, and Matt Coe-Odessa, and defendants Edgar Joel  
33 Martinez-Reyes, Sai Zhang, Chengwu He, Bernardo Mauberis, Raul  
34 Contreras, Xiaolei Ye, Julio Alexander Cabrera, and Vidal Licon-

1 Robles, both individually and by and through their counsel of record,  
2 hereby stipulate as follows:

3       1. The First Superseding Indictment in this case in this case  
4 was made public on April 4, 2024.

5       2. On August 7, 2024, the Court set a trial date of October  
6 21, 2025, and a pretrial conference date of October 8, 2025.

7       3. All stipulating defendants are released on bond pending  
8 trial.

9       4. The status of defendants who are not parties to this  
10 stipulation and have not yet entered guilty pleas<sup>1</sup> is as follows:

11           a. Victor Rodriguez-Trujillo was released on bond with  
12 electronic monitoring, but subsequently cut off his electronic  
13 monitoring devices and absconded from pretrial supervision. He is  
14 now a fugitive whose whereabouts are unknown.

15           b. Daniel Gonzalez is a fugitive who is believed to be  
16 residing in Northern California.

17           c. Jiaxuan He is a fugitive who is believed to be  
18 residing in China.

19           d. Peji Tong is a fugitive who is believed to be in the  
20 custody of Chinese authorities.

21           e. Guillermo Zambrano was released on bond with  
22 electronic monitoring. Zambrano was taken into custody by United  
23 States Immigration and Customs Enforcement ("ICE") in June 2025, was  
24 placed into removal proceedings, and is in ICE custody in Adelanto,

25

26

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27           <sup>1</sup> Diego Acosta Ovalle and Panyu Zhao have signed plea  
28 agreements filed with the Court, but their change of plea hearings  
have not yet occurred.

1 California, pending the outcome of his removal proceeding. Zambrano,  
2 through counsel, objects to a continuance of his trial date.

3 f. Jose Pardo is applying for CASA and the parties will  
4 separately submit a stipulation to continue his trial date on that  
5 basis.

6 5. The parties estimate that the trial in this matter will  
7 last approximately two weeks. All defendants are joined for trial  
8 and a severance has not been granted.

9 6. By this stipulation, defendants move to continue the trial  
10 date to June 2, 2026, and the pretrial conference to May 20, 2026.

11 7. Defendants request the continuance based upon the following  
12 facts, which the parties believe demonstrate good cause to support  
13 the appropriate findings under the Speedy Trial Act:

14 a. Counsel for defendants represent that they have  
15 various prior obligations and trial conflicts. Counsel for  
16 defendants also represent that additional time is necessary to confer  
17 with their defendants, conduct and complete an independent  
18 investigation of the case, conduct and complete additional legal  
19 research including for potential pre-trial motions, review the  
20 discovery and potential evidence in the case, and prepare for trial  
21 in the event that a pretrial resolution does not occur.

22 b. Due to the nature of the prosecution, the number of  
23 defendants, the charges in the indictment and the voluminous  
24 discovery produced to defendants, this case is so unusual and so  
25 complex that it is unreasonable to expect adequate preparation for  
26 pretrial proceedings or for the trial itself within the Speedy Trial  
27 Act time limits.

28

1                   c. Defense counsel represent that failure to grant the  
2 continuance would deny them reasonable time necessary for effective  
3 preparation, taking into account the exercise of due diligence.

4                   d. Defendants believe that failure to grant the  
5 continuance will deny them continuity of counsel and adequate  
6 representation.

7                   e. The government does not object to the continuance.

8                   f. The requested continuance is not based on congestion  
9 of the Court's calendar, lack of diligent preparation on the part of  
10 the attorney for the government or the defense, or failure on the  
11 part of the attorney for the Government to obtain available  
12 witnesses.

13                 8. For purposes of computing the date under the Speedy Trial  
14 Act by which defendant's trial must commence, the parties agree that  
15 the time period of October 21, 2025, to June 2, 2026, inclusive,  
16 should be excluded pursuant to 18 U.S.C. §§ 3161(h) (7) (A),  
17 (h) (7) (B) (i), (h) (7) (B) (ii), and (h) (7) (B) (iv) because the delay  
18 results from a continuance granted by the Court at defendant's  
19 request, without government objection, on the basis of the Court's  
20 finding that: (i) the ends of justice served by the continuance  
21 outweigh the best interest of the public and defendant in a speedy  
22 trial; (ii) failure to grant the continuance would be likely to make  
23 a continuation of the proceeding impossible, or result in a  
24 miscarriage of justice; (iii) the case is so unusual and so complex,  
25 due to the nature of the prosecution and number of defendants, that  
26 it is unreasonable to expect preparation for pre-trial proceedings or  
27 for the trial itself within the time limits established by the Speedy  
28 Trial Act; and (iv) failure to grant the continuance would

unreasonably deny defendant continuity of counsel and would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

9. Zambrano objects to continuing the trial in this matter. Nonetheless, the stipulating parties agree that, pursuant to 18 U.S.C. § 3161(h)(6), the time period of October 21, 2025, to June 2, 2026, constitutes a reasonable period of delay for Zambrano, who is joined for trial with codefendants as to whom the time for trial has not run and no motion for severance has been granted.

10. Nothing in this stipulation shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods be excluded from the period within which trial must commence. Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which trial must commence.

IT IS SO STIPULATED.

Dated: October 1, 2025

Respectfully submitted,

BILAL A. ESSAYLI  
Acting United States Attorney

JOSEPH T. McNALLY  
Assistant United States Attorney  
Acting Chief, Criminal Division

/s/  
J. MARK CHILDS  
JEREMY K. BEECHER  
MATT COE-ODESS  
Assistant United States Attorneys

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

I am EDGAR JOEL MARTINEZ-REYES'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

9/26/25

9 ZAIRA VILLAGOMEZ  
10 Attorney for Defendant  
EDGAR JOEL MARTINEZ-REYES

Date

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026, at 8:30 a.m.

09/26/2025

20  
21 EDGAR JOEL MARTINEZ-REYES  
Defendant

Date

22 **CERTIFICATION OF INTERPRETER**

23 I, Z. Villagomez, am fluent in the written and spoken English and  
24 Spanish languages. I accurately translated this entire agreement  
25 from English into Spanish to defendant EDGAR JOEL MARTINEZ-REYES on  
26 this date.

7-26-25

27  
28 INTERPRETER

Date

I am SAI ZHANG'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.



9/15/2025

REUVEN L. COHEN  
ATOSSA ESMAILI  
Attorney for Defendant  
SAI ZHNAG

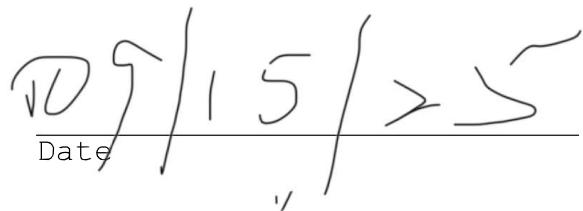
Date

This agreement has been read to me in Mandarin, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026, at 8:30

a.m.



SAI ZHANG  
Defendant



09/15/2025

Date

**CERTIFICATION OF INTERPRETER**

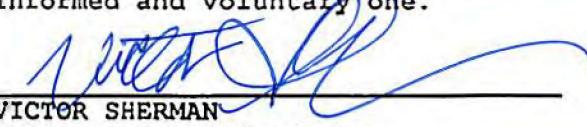
I, Yongjia Johnston, am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant SAI ZHANG on this date.

  
Yongjia Johnston  
INTERPRETER

9/15/2025

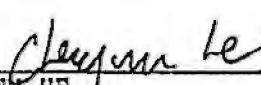
Date

1 I am CHENGWU HE'S attorney. I have carefully discussed every  
2 part of this stipulation and the continuance of the trial date with  
3 my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than June 2, 2026, is an  
7 informed and voluntary one.

8   
9 VICTOR SHERMAN  
10 Attorney for Defendant  
CHENGWU HE

Date 10/1/2025

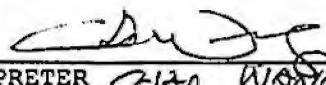
11 This agreement has been read to me in Mandarin, the language I  
12 understand best, and I have carefully discussed every part of it with  
13 my attorney. I understand my Speedy Trial rights. I voluntarily  
14 agree to the continuance of the trial date, and give up my right to  
15 be brought to trial earlier than June 2, 2026. I understand that I  
16 will be ordered to appear in Courtroom 8C of the Federal Courthouse,  
17 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30  
18 a.m.

19   
20 CHENGWU HE  
21 Defendant

Date 10/1/2025

22 CERTIFICATION OF INTERPRETER

23 I, CHAD WANG, am fluent in the written and spoken English and  
24 Mandarin languages. I accurately translated this entire agreement  
25 from English into Mandarin to defendant CHENGWU HE on this date.

26   
27 INTERPRETER CHAD WANG

Date 10/01/2025

I am BERNARDO MAUBERIS'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

*Robert M. Helfend*

9/21/2025

ROBERT M. HELFEND  
Attorney for Defendant  
BERNARDO MAUBERIS

Date

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.

*Bernardo Mauberis*

9/24/2025

BERNARDO MAUBERIS  
Defendant

Date

**CERTIFICATION OF INTERPRETER**

I, \_\_\_\_\_, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant BERNARDO MAUBERIS on this date.

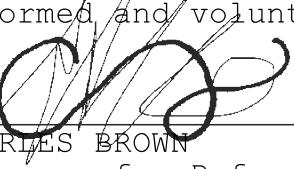
*Bernardo Mauberis*

9/24/2025

INTERPRETER

Date

I am RAUL CONTRERAS' S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.



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CHARLES BROWN  
Attorney for Defendant  
RAUL CONTRERAS

9-26-25  
Date

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.



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RAUL CONTRERAS  
Defendant

9-26-25  
Date

**CERTIFICATION OF INTERPRETER**

I, \_\_\_\_\_, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant RAUL CONTRERAS on this date.

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INTERPRETER

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Date

1 I am XIAOLEI YE'S attorney. I have carefully discussed every  
2 part of this stipulation and the continuance of the trial date with  
3 my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than June 2, 2026, is an  
7 informed and voluntary one.

8 Edward Robinson

9 EDWARD M. ROBINSON  
10 Attorneys for Defendant  
XIAOLEI YE

Sept. 12, 2025

Date

11 This agreement has been read to me in Mandarin, the language I  
12 understand best, and I have carefully discussed every part of it with  
13 my attorney. I understand my Speedy Trial rights. I voluntarily  
14 agree to the continuance of the trial date, and give up my right to  
15 be brought to trial earlier than June 2, 2026. I understand that I  
16 will be ordered to appear in Courtroom 8C of the Federal Courthouse,  
17 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30  
18 a.m.

19   
20 XIAOLEI YE  
21 Defendant

09/12/2025

Date

22 **CERTIFICATION OF INTERPRETER**

23 I, \_\_\_\_\_, am fluent in the written and spoken English and  
24 Mandarin languages. I accurately translated this entire agreement  
25 from English into Mandarin to defendant XIAOLEI YE on this date.

27 INTERPRETER

Date

1 I am JULIO ALEXANDER CABRERA'S attorney. I have carefully  
2 discussed every part of this stipulation and the continuance of the  
3 trial date with my client. I have fully informed my client of his  
4 Speedy Trial rights. To my knowledge, my client understands those  
5 rights and agrees to waive them. I believe that my client's decision  
6 to give up the right to be brought to trial earlier than June 2,  
7 2026, is an informed and voluntary one.

8 DocuSigned by:



9 PETER JOHNSON  
10 Attorney for Defendant  
JULIO ALEXANDER CABRERA

245F9301A801450... 9/18/2025

Date

11 This agreement has been read to me in Spanish, the language I  
12 understand best, and I have carefully discussed every part of it with  
13 my attorney. I understand my Speedy Trial rights. I voluntarily  
14 agree to the continuance of the trial date, and give up my right to  
15 be brought to trial earlier than June 2, 2026. I understand that I  
16 will be ordered to appear in Courtroom 8C of the Federal Courthouse,  
17 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30  
18 a.m.



19 OFF202D1B475477  
20 JULIO ALEXANDER CABRERA  
21 Defendant

9/16/2025

Date

#### CERTIFICATION OF INTERPRETER

22 I, \_\_\_\_\_, am fluent in the written and spoken English and  
23 Spanish languages. I accurately translated this entire agreement  
24 from English into Spanish to defendant JULIO ALEXANDER CABRERA on  
25 this date.

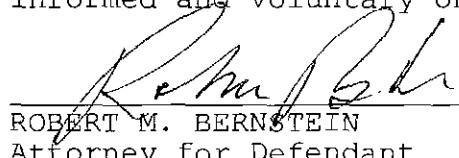
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27  
28 INTERPRETER

Date

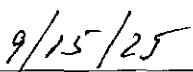
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I am VIDAL LICON-ROBLES'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

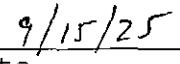
  
ROBERT M. BERNSTEIN  
Attorney for Defendant

VIDAL LICON-ROBLES

  
Date

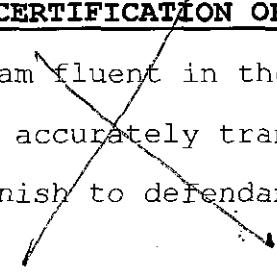
This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.

  
VIDAL LICON-ROBLES  
Defendant

  
Date

**CERTIFICATION OF INTERPRETER**

I, \_\_\_\_\_, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant VIDAL LICON-ROBLES on this date.

  
INTERPRETER

Date